



Mr. Michael Ribordy  
On-Scene Coordinator  
USEPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, IL 60604-3590

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Time-Critical Removal Action – Former Plainwell Impoundment  
Monthly Report (February 2008)

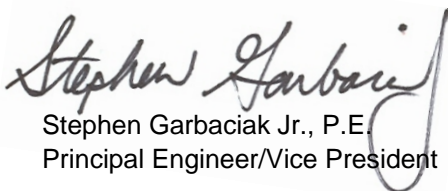
Dear Mike:

Attached is the twelfth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.  
Principal Engineer/Vice President

Copies:

Samuel Borries, USEPA  
Paul T. Bucholtz, MDEQ  
James A. Saric, USEPA  
Jeff Keiser, CH2M HILL  
Bonnie A. Barnett, Esq., Drinker Biddle & Reath LLP  
Steven D. Cook, Esq., Millennium Holdings, LLC  
J. Michael Davis, Esq., Georgia-Pacific Corporation  
Mellonie S. Fleming, Esq., Georgia-Pacific Corporation  
Mark E. Tapp, Millennium Holdings, LLC  
David Guier, Millennium Holdings, LLC  
Paul A. Montney, P.E., Georgia-Pacific Corporation  
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation  
Mark P. Brown, Ph.D., Georgia-Pacific Corporation  
Michael J. Erickson, P.E., ARCADIS

ARCADIS  
30 West Monroe, Suite 1710  
Chicago  
Illinois 60603  
Tel 312.332.4937  
Fax 312.332.4434  
www.arcadis-us.com

INDUSTRIAL

Date:

March 17, 2008

Contact:

Steve Garbaciak

Phone:

312.332.4937 ext. 12

Email:

steve.garbaciak@  
arcadis-us.com

Our ref:

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT**

**REPORT #12, FEBRUARY 2008**

**PREPARED BY ARCADIS  
MARCH 17, 2008**

**ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP**

**SUBMITTED TO**

**MICHAEL RIBORDY, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site TCRA – Former Plainwell Impoundment**

**REPORT #12, FEBRUARY 2008**

**Significant Developments and Activities During the Period**

- On February 1, the Kalamazoo River Study Group (KRSG) submitted Addendum 2 to the October 2007 *Multi-Area Health and Safety Plan* to the United States Environmental Protection Agency (USEPA).
- On February 6, the KRSG submitted a copy of the 35<sup>th</sup> *Weekly Construction Report for the Plainwell TCRA* to USEPA and the Michigan Department of Environmental Quality (MDEQ).
- On February 15, the KRSG submitted the eleventh *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for January 2008 to USEPA.
- On February 20 and 27, the KRSG notified USEPA, MDEQ, United States Fish and Wildlife Service (USFWS) and Michigan Department of Natural Resources (MDNR) of the 2008 Plainwell TCRA Kick Off Meeting to be held on March 5 in Plainwell.
- On February 28, the KRSG submitted the *Site Identification Verification Form – Collection of Data for the Hazardous Waste Report – Hazardous Waste Generated or Managed in Calendar Year 2007* to MDEQ.
- On February 29, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.

**Data Collected and Field Activities Conducted During the Period**

- During the week of February 1, the KRSG continued site preparation activities (clearing and grubbing, installation of staging areas and access roads) near Staging Area 4N.
- During the week of February 4, the KRSG continued site preparation activities (clearing and grubbing, installation of staging areas and access roads) near Staging Area 4N, removed the spent carbon from the 25 gallon per minute (GPM) water treatment system located at Staging Area 3S and replaced it with fresh carbon. The carbon was staged in 55-gallon drums at the staging area to await disposal. Polychlorinated biphenyl (PCB) Wipe Sample Vac-67 was collected from the vacuum truck used to transport water between staging areas to ensure that it had been properly decontaminated. Wastewater samples W\_SA3S\_Influ\_0026, W\_SA3S\_Influ\_0027, W\_SA3S\_Influ\_0028, W\_SA3S\_Influ\_0029 (influent port), W\_SA3S\_MidA\_0025 (midpoint port, right side), W\_SA3S\_MidB\_0026, W\_SA3S\_MidB\_0027, W\_SA3S\_MidB\_0028, W\_SA3S\_MidB\_0029 (midpoint port, left side), W\_SA3S\_EffluA\_00025 (effluent port, right side), W\_SA3S\_EffluB\_0026, W\_SA3S\_EffluB\_0027, W\_SA3S\_EffluB\_0028 and W\_SA3S\_EffluB\_0029 (effluent port, left side)

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were collected from the 25 GPM water treatment system located at Staging Area 3S. Table A summarizes the samples collected.

- During the week of February 11, the KRSG continued site preparation activities (clearing and grubbing, installation of staging areas and access roads) near Staging Area 4N. PCB Wipe Sample VT-2 was collected from the vacuum truck used to remove the carbon from the 25 GPM water treatment system to ensure that it had been properly decontaminated. Table A summarizes the samples collected.
- During the week of February 18, the KRSG concluded clearing and grubbing activities on the north side of the river, commenced clearing and grubbing activities on the south side of the river, continued installing haul roads on both sides of the river, and started installation of the access road between Staging Area 4N and Miller Road. A sample of 21AA aggregate material (K25768) was collected and submitted for Resource Conservation and Recovery Act (RCRA) Metal, Target Compound List (TCL) Volatile Organic Compound (VOC), TCL Semi-Volatile Organic Compound (SVOC), PCB, total petroleum hydrocarbon (TPH) and TCL pesticide analysis. A sample of the spent carbon (Carbon 4) from the 25 GPM water treatment facility (removed during the week of February 5) was also collected and submitted for waste profile parameters—PCBs, Toxicity Characteristic Leaching Procedure (TCLP) VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals, and Reactivity, Corrosivity and Toxicity (RCI)—analysis prior to disposal. A sample of the spent carbon (Carbon 3) removed from the 500 GPM water treatment system in November was collected and submitted for RCI analysis prior to disposal. The sample was analyzed for PCBs, TCLP VOCs, TCLP SVOCs, TCLP Pesticides and RCRA Metals in November. Table A summarizes the samples collected.
- During the week of February 25, the KRSG continued clearing and grubbing on the south side of the river, continued constructing haul roads along both sides of the river, and started installing Staging Area 4N. A composite soil sample (K25769) of Staging Area 4N was collected from the four corners and center of the staging area and submitted for PCB analysis. A sample of the sand (K25770) to be used for access road construction was collected from the Brewer Pit, located on Miller Road, and submitted for TCL VOC, TCL SVOC, RCRA Metal, TCL Pesticides, PCB and TPH analysis. Wastewater samples W\_SA3S\_Influ\_0030, W\_SA3S\_Influ\_0031, W\_SA3S\_Influ\_0032, W\_SA3S\_Influ\_0033 (influent port), W\_SA3S\_MidA\_0026, W\_SA3S\_MidA\_0027, W\_SA3S\_MidA\_0028, W\_SA3S\_MidA\_0029 (midpoint port, right side), W\_SA3S\_MidB\_0030, W\_SA3S\_MidB\_0031, W\_SA3S\_MidB\_0032, W\_SA3S\_MidB\_0033 (midpoint port, left side), W\_SA3S\_EffluA\_0026, W\_SA3S\_EffluA\_0027, W\_SA3S\_EffluA\_0028, W\_SA3S\_EffluA\_0029 (effluent port, right side), W\_SA3S\_EffluB\_0030, W\_SA3S\_EffluB\_0031, W\_SA3S\_EffluB\_0032, W\_SA3S\_EffluB\_0033 (effluent port, left side) and W\_SA3S\_Dup\_0008 were collected from the 25 GPM water treatment system located at Staging Area 3S. Table A summarizes the samples collected.

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- As of January 31, approximately 37,000 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2 and 3. No excavation activities were conducted in February.

**Laboratory Data Received During the Period**

- No laboratory data were received during the week of February 1.
- During the week of February 4, the KRSG received analytical data for PCB wipe sample Vac-67 and wastewater samples W\_SA3S\_Influ\_0026, W\_SA3S\_Influ\_0027, W\_SA3S\_MidA\_0025, W\_SA3S\_MidB\_0026, W\_SA3S\_MidB\_0027, W\_SA3S\_EffluA\_0025, W\_SA3S\_EffluB\_0026 and W\_SA3S\_EffluB\_0027.
- During the week of February 11, the KRSG received analytical data for PCB wipe sample VT-2 and wastewater samples W\_SA3S\_Influ\_0028, W\_SA3S\_Influ\_0029, W\_SA3S\_MidB\_0028, W\_SA3S\_MidB\_0029, W\_SA3S\_EffluB\_0028 and W\_SA3S\_EffluB\_0029.
- No laboratory data were received during the week of February 18.
- During the week of February 25, the KRSG received analytical data for waste water samples W\_SA3S\_Influ\_0030, W\_SA3S\_Influ\_0031, W\_SA3S\_Influ\_0032, W\_SA3S\_Influ\_0033, W\_SA3S\_MidA\_0026, W\_SA3S\_MidA\_0027, W\_SA3S\_MidA\_0028, W\_SA3S\_MidA\_0029, W\_SA3S\_MidB\_0030, W\_SA3S\_MidB\_0031, W\_SA3S\_MidB\_0032, W\_SA3S\_MidB\_0033, W\_SA3S\_EffluA\_0026, W\_SA3S\_EffluA\_0027, W\_SA3S\_EffluA\_0028, W\_SA3S\_EffluA\_0029, W\_SA3S\_EffluB\_0030, W\_SA3S\_EffluB\_0031, W\_SA3S\_EffluB\_0032, W\_SA3S\_EffluB\_0033 and W\_SA3S\_Dup\_0008.
- The KRSG is awaiting analytical data for aggregate samples K25768 and K25770, carbon samples Carbon 3 and Carbon 4, and soil sample K25769.

**Issues Encountered and Actions Taken**

- None

**Developments Anticipated During the Next Reporting Period**

- During the week of March 3, the KRSG is scheduled to continue site preparation activities (clearing and grubbing and installation of staging areas and access roads) and will host the 2008 Plainwell TCRA Kick Off Meeting.

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- During the week of March 10, the KRSG is scheduled to continue site preparation activities (clearing and grubbing, installation of resuspension controls, and installation of staging areas and access roads).
- During the week of March 17, the KRSG is scheduled to begin soil/sediment removal in Removal Area 9B, begin and complete excavation of about 200 linear feet of material located at the downstream end of Removal Area 13B, and install the water control structure scour protection.
- During the week of March 24, the KRSG is scheduled to complete soil/sediment removal in Removal Area 9B, develop access to the Phase 1 Cofferdam, continue to install the water control structure scour protection, and begin and complete site restoration in Removal Area 13B.
- On March 31, the KRSG is scheduled to begin removal of the Phase 1 Cofferdam, begin operation of the water control structure, begin removal of the resuspension controls in Removal Area 13B, and begin post-removal grading of Removal Area 9B.
- The KRSG will continue to submit the *Weekly Construction Reports for the Plainwell TCRA* to USEPA and MDEQ in March. The reports will be prepared and submitted on a bi-weekly basis until removal activities resume during the week of March 17.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in March.
- Throughout March, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

**Kalamazoo River Study Group  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Former Plainwell Impoundment TCRA  
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**Table A — Summary of Samples Collected and Data Received in February 2008**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Aggregate Samples</b>									
K25768	02/19/08	NR	NR	KAR Labs and TAL	21AA aggregate from Brewer pit on Miller Road in Otsego for construction of Staging Area 4N and associated access roads	TPH, PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides	-	-	-
K25770	02/26/08	NR	NR	KAR Labs and TAL	Sand to be mixed with the 21AA aggregate from Brewer pit on Miller Road in Otsego for construction of Staging Area 4N and associated access roads	TPH, PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides	-	-	-
<b>Carbon Samples</b>									
Carbon 3	02/18/08	NR	NR	TAL	Disposal sample from the spent carbon from the former 500 GPM water treatment system. All other parameters were analyzed in sample Carbon 2 (November 2007)	RCI	-	-	-
Carbon 4	02/18/08	NR	NR	KAR Labs and TAL	Disposal sample of the spent carbon from the 25 GPM water treatment system	PCBs, TCLP VOCs, TCLP SVOCs, TCLP Pesticides, RCRA Metals, RCI	-	-	-
<b>Soil Sample</b>									
K25769	02/25/08	NR	NR	KAR Labs	Pre-construction composite sample collected	PCBs	-	-	-
<b>Wastewater Samples</b>									
W_SA3S_Influ_0026	02/06/08	02/06/08	080427	KAR Labs	Staging Area 3S, Discharge 26, influent	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidB_0026					Staging Area 3S, Discharge 26, midpoint	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0026					Staging Area 3S, Discharge 26, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0027	02/07/08	02/08/08	080449	KAR Labs	Staging Area 3S, Discharge 27, influent	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0025					Staging Area 3S, Discharge 27, midpoint	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0025					Staging Area 3S, Discharge 27, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = 16 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0027					Staging Area 3S, Discharge 27, midpoint	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0027					Staging Area 3S, Discharge 27, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 3.

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**Table A — Summary of Samples Collected and Data Received in February 2008**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
<b>Wastewater Samples (Contd.)</b>									
W_SA3S_Influ_0028	02/08/08	02/11/08	080474	KAR Labs	Staging Area 3S, Discharge 28, influent sample	PCBs	0.1 µg/L	-	-
W_SA3S_MidB_0028					Staging Area 3S, Discharge 28, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0028					Staging Area 3S, Discharge 28, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = 18 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0029	02/08/08	02/12/08	080479	KAR Labs	Staging Area 3S, Discharge 29, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidB_0029					Staging Area 3S, Discharge 29, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0029					Staging Area 3S, Discharge 29, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0030	02/25/08	02/27/08	080673	KAR Labs	Staging Area 3S, Discharge 30, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0026					Staging Area 3S, Discharge 30, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0026					Staging Area 3S, Discharge 30, effluent sample, right side	PCBs, TSS, P	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=<0.02 mg/L, No Action Limit
W_SA3S_MidB_0030					Staging Area 3S, Discharge 30, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0030					Staging Area 3S, Discharge 30, effluent sample, left side	PCBs, TSS, P	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=<0.02 mg/L, No Action Limit
W_SA3S_Influ_0031					Staging Area 3S, Discharge 31, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0027					Staging Area 3S, Discharge 31, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0027					Staging Area 3S, Discharge 31, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0031					Staging Area 3S, Discharge 31, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0031					Staging Area 3S, Discharge 31, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 3.



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**Table A — Summary of Samples Collected and Data Received in February 2008**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (Contd.)									
W_SA3S_Influ_0032	02/27/08	02/29/08	080709	KAR Labs	Staging Area 3S, Discharge 32, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0028					Staging Area 3S, Discharge 32, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0028					Staging Area 3S, Discharge 32, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0032					Staging Area 3S, Discharge 32, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0032 [W_SA3S_Dup_0008]					Staging Area 3S, Discharge 32, effluent sample, left side	PCBs, TSS [PCBs]	< 0.1 µg/L [< 0.1 µg/L]	Monthly Average of 2.6 x 10-5 µg/L [Monthly Average of 2.6 x 10-5 µg/L]	None: TSS = <4 mg/L, Action Limit = 45 mg/L [-]
W_SA3S_Influ_0033	02/28/08	02/29/08	080728	KAR Labs	Staging Area 3S, Discharge 33, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0029					Staging Area 3S, Discharge 33, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0029					Staging Area 3S, Discharge 33, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0033					Staging Area 3S, Discharge 33, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0033					Staging Area 3S, Discharge 33, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
PCB Wipe Samples									
Vac-67	02/05/08	02/06/08	080407	KAR Labs	Interior of the vacuum truck used to move water between staging areas	PCBs	< 0.1 µg/100 cm²	10 µg/100 cm² <sup>1</sup>	None
VT-2	02/13/08	02/15/08	080527	KAR Labs	Interior of the vacuum truck used to remove the carbon from the water treatment systems	PCBs	0.2 µg/100 cm²	10 µg/100 cm² <sup>1</sup>	None

**Notes:**

1 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3).

\* Duplicate samples are shown in brackets.

\* Analytical results have not been validated.

cm<sup>2</sup> - square centimeters  
NR - not received  
P - Phosphorus  
PCB - Polychlorinated Biphenyls

RCRA - Resource Conservation and Recovery Act  
RCI - Reactivity, Corrosivity, Ignitability  
SVOCs - Semi-Volatile Organic Compounds  
TAL - TestAmerica Laboratories

TCL - Target Compounds List  
TCLP - Toxicity Characteristic Leaching Procedure  
TPH - Total Petroleum Hydrocarbons  
TSS - Total Suspended Solids

VOCs - Volatile Organic Compounds  
mg/kg - milligrams per kilogram  
mg/L - milligrams per liter  
µg/L - micrograms per liter